

THE HONORABLE RICARDO S. MARTINEZ

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON

LAURA PAULSON, an individual,

Plaintiffs,

vs.

WELLS FARGO & COMPANY SALARY  
CONTINUATION PAY PLAN; an ERISA  
Plan; and WELLS FARGO COMPANY, a  
Delaware Corporation,

Defendants.

Case No. 2:20-cv-1200-RSM

**STIPULATED MOTION TO RENOTE  
MOTION AND STAY LITIGATION  
AND ORDER**

**STIPULATED MOTION**

1. Pursuant to LCR 7(j), the undersigned parties hereby stipulate and request to re-note the Defendants' Motion to Dismiss (Dkt. #9) for consideration until at least November 13, 2020 and extend all responsive pleading deadlines under LCR 7(d)(3) accordingly. The parties believe good cause exists because Plaintiff's counsel has communicated scheduling conflicts and requested additional time for Plaintiff to prepare her responsive pleading, which would require Defendants' Motion to Dismiss to be re-noted to November 13, 2020.

2. Pursuant to LCR 7(j) and 16(a), the undersigned parties further hereby request a stay of litigation of at least fourteen (14) days following this Court's decision on Defendant's

STIPULATED MOTION AND ORDER TO RENOTE  
MOTION AND STAY LITIGATION  
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1 Motion to Dismiss (Dkt. #9) filed on October 5, 2020. As a result of this stay, the parties request  
 2 that the deadlines for their FRCP 26(f) Conference, Initial Disclosures, and Joint Status Report,  
 3 as provided in its September 24, 2020 Order (Dkt. #5), be extended until after the stay is lifted.  
 4 The parties believe good cause exists for a brief stay to allow the parties to focus on their  
 5 respective pleadings regarding Defendants' Motion to Dismiss and this Court to rule on said  
 6 Motion. Fourteen (14) days after this Court's Order on Defendants' Motion to Dismiss, the  
 7 stay will be lifted, and litigation will resume on any surviving claims to the extent any remain.  
 8 Once the stay is lifted fourteen (14) days after this Court's decision on Defendants' Motion to  
 9 Dismiss, the parties will agree and proceed with the initial deadlines provided in the Court's  
 10 September 24, 2020 Order (Dkt. #5).

11 DATED this 22<sup>nd</sup> day of October, 2020.

12 FISHER & PHILLIPS LLP

12 SAPPHIRE LEGAL, PLLC

14 By: /s/ Ryan R. Jones

14 By: /s/ Kristi Favard (per email authorization)

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19 *Attorney for Plaintiff*

19 (206) 682-7908 FAX

20 *Attorney for Defendants*

**ORDER**

Based on the foregoing Stipulation, it is hereby ORDERED:

1. Defendants' Motion to Dismiss (Dkt. #9) is re-noted for consideration to Friday, November 13, 2020 with all responsive deadlines under LCR 7(d)(3) adjusted accordingly; and

2. This litigation is stayed until fourteen (14) days after this Court's Order on Defendants' Motion to Dismiss (Dkt. #9).

Entered this 22<sup>nd</sup> day of October, 2020.



RICARDO S. MARTINEZ  
CHIEF UNITED STATES DISTRICT JUDGE

**CERTIFICATE OF SERVICE**

I hereby certify that on the date below written, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system and caused to be served a true and correct copy of same by the method indicated below and addressed as follows:

Kristi Favard, WSBA #34419  
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I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct

DATED this 22<sup>nd</sup> day of October, 2020.



Susan Grimes, Legal Assistant